

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WISCONSIN

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EDGEWOOD HIGH SCHOOL OF THE  
SACRED HEART, INC.,

Case No. 3:21-cv-00118

Plaintiff,

v.

CITY OF MADISON, WISCONSIN, *et al.*,

Defendants.

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**AFFIDAVIT OF PAUL J. COVALESKI**

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STATE OF WISCONSIN                    )  
  ) ss.  
COUNTY OF DANE                    )

Paul J. Covaleski, being duly sworn on oath, states as follows:

1. I am one of the attorneys for Edgewood High School in this matter and make this affidavit upon personal knowledge.
2. On September 13, 2021, Edgewood served its Rule 26(a) Disclosures. Shortly after, I called Attorney Zylstra to confirm her receipt of them and inquire about the status of Defendants' Rule 26(a) Disclosures. Attorney Zylstra requested a brief extension, which Edgewood granted. At no point during our conversation did Attorney Zylstra indicate Defendants would be seeking an extension of the discovery stay.
3. Attached as Exhibit A is a true and correct copy of a September 2021 email correspondence between Attorney Zylstra and me.
4. On November 12, 2021, Attorney Zylstra called to inform me that Defendants would be filing a Motion to Extend Discovery Stay, and asked whether Edgewood opposed the

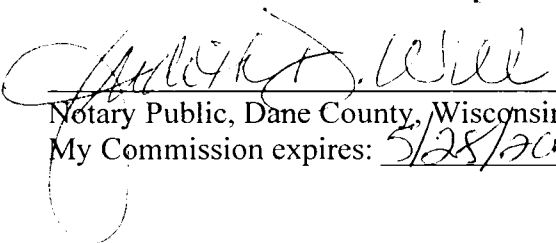
motion. She also asked whether Edgewood objected to a stay of discovery while the Court ruled on Defendants' Motion to Extend. She also previewed that Defendants would likely object to some of Edgewood's discovery requests, and confirmed that Edgewood would be willing to meet and confer at a later date.

5. Attorney Zylstra did not identify any specific request that Defendants objected to; we did not discuss any specific objections; and we did not discuss the content or substance of the Motion to Extend in any way.

Dated: November 19, 2021.

  
Paul J. Covaleski

Subscribed and sworn to before me  
this 19<sup>th</sup> day of November, 2021.

  
Notary Public, Dane County, Wisconsin  
My Commission expires: 5/28/2024

